

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Shema M. BRYAN

20 CV 1627

Write the full name of each plaintiff.

(Include case number if one has been assigned)

-against-

The City University of New York,
JOHN Jay College of Criminal Justice
Jane and JOHN Doe (1-50)

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

- Title VI of The Civil Rights Act of 1964
- The Fourteenth Amendment of The U.S. Constitution
- The Equal Education Opportunities Act of 1974

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Shema M. BRYAN, is a citizen of the State of
(Plaintiff's name)

New York State
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, The City University of New York, is a citizen of the State of
(Defendant's name)

NEW YORK

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If the defendant is a corporation:

The defendant, JOHN Jay college, is incorporated under the laws of
the State of NEW YORK

and has its principal place of business in the State of NEW YORK

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Shema M Bryan
First Name Middle Initial Last Name

438 Wyona Street Apt # 3
Street Address

Brooklyn Ny 11207
County, City State Zip Code

(917) 736-7811 Shema.bryan@jjay.cuny.edu
Telephone Number Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	<div style="border-bottom: 1px solid black; padding-bottom: 2px;">The City University of New York</div> <div style="display: flex; justify-content: space-between; font-size: small;"> First Name Last Name </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;">(Cuny) Office of General Counsel</div> <div style="font-size: small;">Current Job Title (or other identifying information)</div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;">205 E 42nd Street</div> <div style="font-size: small;">Current Work Address (or other address where defendant may be served)</div> <div style="display: flex; justify-content: space-between; font-size: small;"> New York NY 10017 </div> <div style="display: flex; justify-content: space-between; font-size: small;"> County, City State Zip Code </div>
Defendant 2:	<div style="border-bottom: 1px solid black; padding-bottom: 2px;">John Jay College of Criminal Justice</div> <div style="display: flex; justify-content: space-between; font-size: small;"> First Name Last Name </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;">Gabriela Leal, Esq.</div> <div style="font-size: small;">Current Job Title (or other identifying information)</div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;">524 West 59th Street</div> <div style="font-size: small;">Current Work Address (or other address where defendant may be served)</div> <div style="display: flex; justify-content: space-between; font-size: small;"> New York NY 10019 </div> <div style="display: flex; justify-content: space-between; font-size: small;"> County, City State Zip Code </div>
Defendant 3:	<div style="border-bottom: 1px solid black; padding-bottom: 2px;"></div> <div style="display: flex; justify-content: space-between; font-size: small;"> First Name Last Name </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"></div> <div style="font-size: small;">Current Job Title (or other identifying information)</div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"></div> <div style="font-size: small;">Current Work Address (or other address where defendant may be served)</div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"></div> <div style="display: flex; justify-content: space-between; font-size: small;"> County, City State Zip Code </div>

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: 524 West 59th Street, New York, NY 10019Date(s) of occurrence: 9/17/19 ^{Through} ~~to~~ Present

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

On or Around 9/17/19 I Discovered That I Qualified For An invite into The Schools honors program. When I inquired about my qualifications - I was told That my Grades were not computed in The system and That by The next Recruitment phase - I will have accumulated too many credits to qualify for The Program.

Through The college's own admission a flaw in Their system prevented me from getting an invite into The ~~program~~ Honors program.

I was told point blank That The only resolution is to tell me They are sorry and That They

will edit Their website which mapped out my actual qualifications for entrance into The program.

The college is being deceitful in stating that I was excluded from recruitment due to an error in their system. In fact, I like numerous minority students ~~from~~ being discriminated against. They are intentionally vetting out Black and Hispanic students.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

violation of Rights guaranteed to me by The U.S. Constitution. Denial of benefits of the program which includes: Free tuition, \$ 7,500 Opportunities Fund to pursue global Learning, internships & other services and learning opportunities, A Macbook pro Laptop... see attached document for cont.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

PRAYER: Compensatory Damages: \$10,000,000 (Ten million Dollars). Punitive Damages and Award such additional Relief as Justice may Require.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

Dated		Plaintiff's Signature
Shema	M	Bryan
First Name	Middle Initial	Last Name
438 Wyona Street		Apt #3
Street Address		
Brooklyn	NY	11207
County, City	State	Zip Code
(917) 736-7811	shema.bryan@jay-cuny.edu	
Telephone Number	Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK – Attached Document

INJURIES CONTINUATION

As a result of these actions:

... Macbook Pro Laptop, cultural passport, losing this opportunity will greatly affect my future earnings and the ability to enter an Ivy League Law School. In addition, I was later retaliated against for my complaint and was denied benefits withⁱⁿ the Urban Male Initiatives program and lost my dream fellowship at the Innocence Project.